

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA, )  
                                  )  
Plaintiff,                  )  
                                  )  
vs.                            ) Case No. 4:14-CR-00175 AGF (DDN)  
                                  )  
MARK PALMER *et. al.*,     )  
                                  )  
Defendant.                 )

**DEFENDANTS' JOINT MOTION TO EXTEND DEADLINE  
TO FILE ANY REPLIES ON PENDING PRE-TRIAL MOTIONS**

COME NOW Defendants, by and through their respective undersigned counsel, and pursuant to Fed. R. Crim. P. 45(b)(1)(A) and E.D.Mo. L.R. 7 – 4.01, hereby move for the Court to enter its Order granting them an extension of time to and including December 3, 2015 in which to file any replies in support of their pending pre-trial motions. In support of their motion, Defendants state as follows:

1.       Defendants filed certain pre-trial motions on October 8, 2015 (“Defendants’ Motions”). *See* Docs. 181-185.
2.       After requesting a one-week extension of the November 9, 2015 deadline to file its responses to Defendant’s Motions, the Government filed a 27-page omnibus response on November 16, 2015. *See* Doc. 192.
3.       Pursuant to E.D.Mo. L.R. 7 – 4.01, reply memoranda in support of Defendants’ Motions are due on November 27, 2015. *See* Fed. R. Crim. P. 45(a)(1)(C), 45(c) and 5(b)(2)(E).

4. In view of the fact that the reply deadline falls one day after the Thanksgiving holiday, a day on which the Court is closed, and in order for remaining defense counsel to comply with the Court's order that submissions on motions to dismiss be filed jointly by all defendants (*see* Doc. 150), more time is necessary to coordinate such joint filings in reply to the issues raised by the Government's response.

5. Defendants therefore respectfully request that the Court enter its Order extending to December 3, 2015 the deadline by which they may file any reply in support of their pending pre-trial motions.

WHEREFORE, for the foregoing reasons, Defendants jointly request that the Court grant their motion and enter its Order extending until December 3, 2015 the time in which they may file any reply in support of their pending pre-trial motions, and grant all such other and further relief this Court finds just and warranted under the circumstances.

Dated: November 27, 2015

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 27th day of November, 2015, a true and correct copy of the foregoing was filed with the Court using the CM/ECF system, and service upon all participants in the case who are CM/ECF users will be accomplished by operation of that system.

/s/ James E. Crowe, III